



October 16, 2024

Via ECF

Hon. Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Street
New York, NY 10007

**Re: Kathryn Shiber v. Centerview Partners LLC
1:21-cv-03649-ER**

Dear Judge Ramos:

I represent the Plaintiff Kathryn Shiber in the above-referenced matter. I write pursuant to Section 3(ii) of this Court's Individual Practices and ¶12(c) of the Stipulated Protective Order (Dkt. No. 42) to respectfully request permission to file documents under seal in connection with Plaintiff's opposition to Defendant's motion for summary judgment, with leave to file redacted documents on the public record.

Specifically, Plaintiff will be submitting the following materials that contain information marked as "Confidential" pursuant to the Protective Order:

- Portions of Plaintiff's Memorandum of Law and Counter 56.1 Statement that contain information that Defendant has marked as "Confidential," and which the Court permitted to be sealed in its Order of September 10, 2024.
- Exhibit 2 = Plaintiff's resume, which contains her private address and contact information.
- Exhibits 3-5, 7-8 = documents that contain the email addresses of Centerview's employees.
- Exhibit 6 = documents that contain the email addresses of the Plaintiff and her medical provider

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- Exhibit A = portions of Plaintiff's deposition transcript that contain her private contact information, as well as information that Defendant has marked as "Confidential."
- Exhibits B – E = portions of deposition transcripts of Defendants' witnesses that contain information Defendant has marked as "Confidential."

Accordingly, Plaintiff respectfully requests the Court grants her request for leave to seal portions of her opposition to Defendant's motion for summary judgment and allow redacted versions of same to be entered in the public docket.

We thank the Court for its consideration of this request.

Respectfully submitted,



BRIAN HELLER

cc: All counsel – via ECF